

**In the United States District Court
For the Southern District of Texas
Houston Division**

**Michel Jackson and
Melanie Dobbs,**

Plaintiffs,

V.

**Harris County, Texas,
Juan A. Lerma, and
I. Cantu,**

Defendants.

[illegible]

Civil Action No. _____

Jury Demand

DEFENDANT HARRIS COUNTY, TEXAS' NOTICE OF REMOVAL

TO THE MOST HONORABLE JUDGE OF SAID COURT

Defendant Harris County, Texas (“Defendant”), files this Notice of Removal pursuant to 28 U.S.C. §§ 1331 and 1441, respectfully showing the Court the following:

1. Defendant seeks to remove Plaintiffs Michel Jackson and Melanie Dobbs’ (“Plaintiffs”) lawsuit from state court based on this Court’s original jurisdiction over claims arising under federal law. 28 U.S.C. §§ 1331, 1441(a), and 1441(c).

2. On October 11, 2017, Plaintiffs filed Plaintiff's Original Petition & Request for Disclosure ("Plaintiffs' Original Petition") under Cause No. 2017-67642, *Michel Jackson and Melanie Dobbs v. Harris Count, Texas et al*, in the 269th Judicial District Court of Harris County, Texas. Plaintiffs made a jury demand. Plaintiffs' Original Petition alleges causes of action under 42 U.S.C. § 1983.¹

¹ Plaintiffs' Original Petition, ¶¶ 21, 25, 28.

3. Plaintiffs served process on Defendant Harris County, Texas on November 30, 2017. Plaintiff has not served Plaintiffs' Original Petition on Defendants Juan A. Lerma and I. Cantu. This notice is filed within thirty (30) days after Defendants were served with Plaintiff's Original Petition. 28 U.S.C. § 1446(b)(1)–(2).

4. Venue in this Court is proper because Defendant is Harris County, Texas, which is located within the Houston Division of the Southern District of Texas. In addition, a substantial part of the alleged events or omissions giving rise to Plaintiffs' claims allegedly occurred in Harris County. 28 U.S.C. § 1391 (b)(1), (2).

5. Copies of all process and pleadings filed in Cause No. 2017-67642 have been appended to this Notice. The appendix includes a table of contents. Defendant has also appended a civil cover sheet and a list of counsel.

6. Written notice of the filing of this Notice of Removal is being served on all adverse parties as required by 28 U.S.C. § 1446(d). A true and correct copy of this Notice will be filed with the District Clerk of Harris County, Texas, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant Harris County, Texas, respectfully request that this action be removed to the United States District Court.

Respectfully submitted,

Of Counsel:

Vince Ryan
Harris County Attorney

/s/ Armando S. Chiu

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Attorney-in-Charge for Defendant Harris County,
Texas

Certificate of Service

I certify that a true and correct copy of this pleading was delivered on December 27, 2017
to Plaintiffs as follows:

Counsel for Plaintiffs via email and fax

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/s/ Armando S. Chiu

Armando S. Chiu
Assistant County Attorney